REMARKS

Applicants respectfully request consideration of the subject application as amended herein. This Amendment is submitted in response to the Office Action mailed December 9, 2005. Claims 1-13 are rejected. In this Amendment, claims 1-4, 7-9 and 11 have been amended. New claims 41-43 have been added. No new matter has been added.

Applicants reserve all rights with respect to the applicability of the Doctrine of Equivalents.

INFORMATION DISCLOSURE STATEMENT

Applicants respectfully request the Examiner to consider the references cited in the IDS submitted on August 28, 2002.

PRIORITY

Applicants respectfully submit that the disclosure of the prior-filed application, provisional Application No. 60/207,314, provides adequate support the claims of the present application, as required by the 35 U.S.C. § 112, first paragraph. Therefore, the claim of priority to Application No. 60/207,314 is correct.

In particular, applicants refer, for instance, to lines 7-9 of page 2, lines 6-9 of page 6, and lines 15-28 of page 25 of Application No. 60/207,314, which provides support for the term "BaseObject."

REQUEST FOR INFORMATION

Applicants respectfully submit that to the best of applicants' knowledge, no copies of the User Manual (version 6) and specifically the Ariba ORMS API Guide (v 6.0) were

provided to customer's, user's or others prior to May 26, 1999 without requiring them to sign a Confidentially document.

Applicants respectfully submit that to the best of applicants' knowledge, no briefings and/or Presentations were made to the Public prior to May 26, 1999, which described the technical operation disclosed in the ORMS API Guide and specifically the technical features including BaseObject, variant and shape.

Applicants respectfully submit that to the best of applicants' knowledge, no briefings and/or Presentations were provided to the Public prior to May 26, 1999, which disclosed a method and system for providing multi-organizational resource management, which provide the capability for sharing information/data between disparate applications such as between ERP packages such as SAP, PeopleSoft, Oracle or Baan as well as purchase orders.

Applicants respectfully submit that to the best of applicants' knowledge, no briefings and/or Presentations were provided to the Public prior to May 26, 1999, which disclose a method and system to enable one to understand the technical features described in the ORMS API Guide and specifically the use and/or advantages of BaseObject, variant, shape and partition in enabling multiple ERP integration.

Rejections under 35 U.S.C. § 112

The Examiner has rejected claims 1-7 and 11-12 under 35 U.S.C. §112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In particular, Examiner has objected to the use of terms BaseObject, variant, shape, extrinsic and partition and has stated that these terms are not defined by the claim, the specification does not provide a standard for ascertaining the requisite degree, and one of ordinary skill in the art would not be reasonably apprised of the

scope of the invention.

Applicants have amended the claims to define the term "BaseObject" as a "persistent EA object."

Applicants respectfully submit that the remaining terms are well defined in the specification and one of ordinary skill in the art would be reasonably apprised of the scope of the invention based on the specification.

The specification defines the term "variant" as follows:

> Variants define the data types (shape) and behavior of each individual external application. That is, variants are used to define differently shaped data of the same general type for the varying external applications. In one embodiment, methods that defines the behavior (e.g. business rules and ordering modules) are also encapsulated in a variant on a per-variant basis for the different external applications. Variants may also be used to defined required or validated fields. Although, in one embodiment, variants define the shape of the data, variants do not supply the data.

(Specification, p. 6 to p. 7, ¶35 and ¶36).

The specification defines the term "partition" as follows:

> [P]artitions are used to describe the structuring of data (e.g. content).... The partition 320 and partition 330 [of variant 310] are used to segment identically shaped data of variant 310. Therefore, a partition is a collection of data content, which uses some particular variant to describe the shape of that data. In addition, one partition may be related to one but not multiple variants.

(Specification, p. 7, ¶36).

Applicants further submit that the term "shape" is well known in the art of enterprise resource planning. See, e.g., www.crescentbaysoftware.com/dpce/terms.html, which defines "shape" as a [data] type whose values consist of the following components: rank, dimensions, layout, and context.

Rejections under 35 U.S.C. § 102(e)

The Examiner has rejected claims 1-8 and 10-13 under 35 U.S.C. §102(e) as being

anticipated by Taylor (USPN 6,257,676, "Taylor").

In claim 1, applicants claim a first variant and a second variant. The first variant is a collection of a plurality of BaseObjects, and the second variant is a collection of BaseObjects representing the differences from the first variant required to integrate the EA with a first external application. A BaseObject is a persistent EA object.

Taylor discloses integrating enterprise applications by using an agent-adapter architecture. Taylor discloses:

> A plurality of adapters, each of which is adapted to perform a discrete function associated with respective ones of the plurality of enterprise applications is encapsulated by an agent. The agent is extensible, including one or more embedded objects, each of which is adapted to perform a discrete function that may or may not be associated with respective ones of the plurality of enterprise applications.

(Taylor, Abstract).

> These adapters convert the data formats and applications semantics from the sending application to the receiving application. There are many conversion requirements. They range from basic data transformation to resolving the incompatibilities that exist between the structure (syntax), meaning (semantics) and timing of the information that must be shared.

(Taylor, col. 4, lines 59-65).

> The agent component 210 acts as an independent software process, which hosts one or more adapter components 220 (FIG. 4(a)), or 222 and 224 (FIG. 4(b)). It encapsulates sophisticated functionality such as store and forward caching, filtering, resource pooling, and scheduling.

(Taylor, col. 12, lines 52-57).

Thus, Taylor discloses two pieces of software: an agent for store and forward caching, filtering, resource pooling, and scheduling, and an adaptor for converting the data formats and applications semantics from a sending application to a receiving application. Taylor does not teach or suggest a variant comprising a collection of BaseObjects representing the differences from the first variant required to integrate the EA with a first external application.

Applicants respectfully submit that Taylor's disclosed agent and adapter are not equivalent to the variants, as claimed. Therefore, Taylor does not anticipate claim 1 and associated dependent claims.

Rejections under 35 U.S.C. § 103(a)

The Examiner has rejected claim 7 under 35 U.S.C. §103(a) as being unpatentable over Taylor in view of Butt (USPN 6,243,752, "Butt").

Butt discloses that a terminal computer is used to send instructions to a host computer through a public network to open and close application programs and to transmit data between the application programs and the terminal computer through the public network. (Butt, Abstract). But does not teach or suggest a variant comprising a collection of BaseObjects representing the differences from the first variant required to integrate the EA with a first external application, as claimed.

As neither Taylor nor Butt teaches each and every limitation of independent claim 1, associated dependent claim 7 is not obvious over the combination.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Lester Vincent at (408) 720-8300.
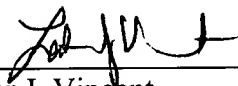
Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR
& ZAFMAN LLP

Dated: ___May 9___, 2006

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Lester J. Vincent
Attorney for Applicant
Registration No. 31,460

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1026
(408) 720-8300